

### SECTION III—REMARKS

This amendment is submitted together with an RCE in response to the final Office Action mailed April 13, 2007. Claim 1 is amended and claims 1-6 and 9 remain pending in the application. Applicants respectfully request reconsideration of the application and allowance of all pending claims in view of the above amendments and the following remarks.

#### Rejections Under 35 U.S.C. § 102

The Examiner rejected claims 1-3 and 5 as anticipated under 35 U.S.C. § 102(b) by U.S. Patent No. 5,600,181 to Scott *et al.* ("*Scott*"). Applicants respectfully traverse the Examiner's rejections. A claim is anticipated only if each and every element, as set forth in the claim, is found in a single prior-art reference. MPEP § 2131; *Verdegaal Bros. v. Union Oil of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). For at least the reasons explained below, Applicants submit that *Scott* cannot anticipate these claims because it does not disclose every element and limitation recited therein.

Claim 1, as amended, recites an apparatus combination including:

a die mounted directly on a surface of a substrate,  
the die being connected to the substrate by a plurality of  
wires; and

a mold cap encapsulating the die and the plurality of  
wires, the mold cap comprising:

an electrically insulating portion encapsulating  
substantially all the wires and the entire die, and

a thermally conductive portion encapsulating  
substantially all the electrically insulating portion, wherein  
the thermally conductive portion is in direct contact *only*

*with the surface of the substrate to which the die is mounted and the entire part of the surface of the electrically insulating portion that is not in contact with the substrate, the die or the wires.*

(italics added). *Scott* discloses, in figures 3-6, an apparatus in which several dies 12 are mounted to a substrate 10. Dies 12 are then encapsulated in a potting material 30 to provide support to the dies and their connecting leads. After dies 12 are encapsulated with potting material 30, the entire assembly—substrate 10, dies 12, potting material 30, and everything else—is encapsulated within a layer 32 of a suitable material. The Examiner alleges that material 32 is analogous to the thermally conductive portion of the mold cap recited in the claim, but as pointed out by *Scott*, it is important that material 32 completely encapsulate the entire assembly (col. 2, lines 53-55). *Scott* therefore cannot disclose, teach or suggest a combination including a mold cap with a thermally conductive portion that is in direct contact “only with the surface of the substrate to which the die is mounted and the entire part of the surface of the electrically insulating portion that is not in contact with the substrate, the die or the wires.” For at least this reason, Applicants submit that *Scott* cannot anticipate the claim. Applicants therefore respectfully request withdrawal of the rejection and allowance of the claim.

Regarding claims 2-3 and 5, if an independent claim is allowable, then any claim depending therefrom is also allowable. *See generally* MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 1 is in condition for allowance. Applicants submit that claims 2-3 and 5 are therefore allowable by virtue of their dependence on an allowable independent claim, as well as by virtue of the features

recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

#### Rejections Under 35 U.S.C. § 103

The Examiner rejected claims 4, 6 and 9 under 35 U.S.C § 103(a) as obvious in view of, and therefore unpatentable over, *Scott* in view of U.S. Patent No. 6,309,915 to DiStefano (“*DiStefano*”). Applicants respectfully traverse the Examiner’s rejections. If an independent claim is non-obvious under 35 U.S.C. § 103, then any claim depending therefrom is also non-obvious. MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, independent claim 1 is in condition for allowance. Applicants submit that claims 4, 6 and 9 are therefore allowable by virtue of their dependence on an allowable independent claim, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

#### Conclusion

Given the above amendments and accompanying remarks, all claims pending in the application are in condition for allowance. If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to allowance of the claims, the Examiner is requested to specifically point out where such teaching may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact the undersigned attorney at (206) 292-8600.

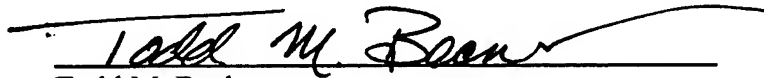
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Respectfully submitted,

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